

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EUGENE WESTMORELAND,

Plaintiff,

v.

THOMAS J. DART, et al.

Defendants

Case No. 23-cv-1851

Judge Tharp, Jr.

Magistrate Judge Gilbert

**DEFENDANT COOK COUNTY SHERIFF THOMAS J. DART’S AMENDED  
ANSWERS TO PLAINTIFF EUGENE WESTMORELAND’S FIRST SET OF  
INTERROGATORIES #1, 3-4**

NOW COMES Defendant, COOK COUNTY SHERIFF THOMAS J. DART, in his official capacity, (hereinafter “Defendant”), by and through his attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, and for his answers to Plaintiff’s first set of Interrogatories, states as follows:

**INTERROGATORIES**

1. From March 24, 2021 to the present, identify the number of detainees assigned to the Residential Treatment Unit (RTU) who have been prescribed a wheelchair to use at all times

**ANSWER:** During a discussion among counsel for the parties on July 25, 2023, it was agreed that the date for this interrogatory and a corresponding request to produce (Number 1) would be limited to May 30, 2023. Accordingly, the information set forth below includes a specific reference to May 30, 2023. In an effort to provide additional information dating back to March 2021, Defendant submits the following information:

RTU Assignment Date	Total IIC with “Wheelchair Long Distance Only” Alert	Total IIC with “Wheelchair” Alert
3/31/2021	15	19
3/31/2022	12	16
5/30/2023	9	16

3. Identify the number of individuals housed in the RTU with a wheelchair long distance alert on May 30, 2023.

**ANSWER: 9**

4. Identify the number of individuals housed in the RTU with a wheelchair alert on May 30, 2023.

**ANSWER: 16**

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that **Defendant Sheriff Thomas J. Dart's Amended Answers to Plaintiff's Interrogatories # 1, 3-4** were sent via email correspondence to all below listed parties on August 4, 2023.

/s/ Zachary G. Stillman  
Zachary G. Stillman  
One of the Attorneys for Defendants

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**VERIFICATION FOR DEFENDANT SHERIFF'S AMENDED ANSWERS TO  
PLAINTIFF'S INTERROGATORIES**

I, Khara Coleman, Deputy General Counsel for the Cook County Sheriff's Office – Civil Litigation and Torts, under penalties as provided by law pursuant to 28 U.S.C. § 1746, certify that the statements set forth in *Defendant Sheriff Thomas Dart's Amended Answers to Plaintiff's Interrogatories # 1, 4-5*, are true and correct to the best of my inquiry, knowledge, and belief. The statements provided herein are not based on my personal knowledge, sole or personal recollection, or memory, but rather were gathered by reviewing the records and documents in possession of the Cook County Sheriff's Office, by consulting persons employed in the Cook County Sheriff's Office, in coordination with and upon advice of undersigned counsel of record in this litigation.

Dated: August 3, 2023

Khara Coleman

Digitally signed by Khara  
Coleman  
Date: 2023.08.03 13:10:20  
-05'00'

Khara Coleman  
Deputy General Counsel for the Cook County  
Sheriff's Office – Civil Litigation and Torts